

Exhibit B

From: [Reiser, Craig M.](#)
To: [Maier, Eric J.](#); [Thorne, John](#); [Bird, Daniel G.](#); [Davis, Tiberius T.](#); [Goodnow, Christopher C.](#); [Sherrerd, Devon L.](#)
Cc: [Boisvert, Caroline P.](#); [Yung, Eva H.](#); [Haws, Claire L.](#)
Subject: In re Google Digital Advertising Antitrust Litig. // MTD Ruling
Date: Wednesday, March 6, 2024 4:56:28 PM
Attachments: [AxinnLogo_eb86e062-85ba-4da5-903a-7a60628f62291111.png](#)

Counsel,

Consistent with the Court's prior orders following dismissal rulings in the MDL, we would like to agree on and propose to the Court a process to streamline matters following the Court's ruling on Google's motions to dismiss. We'd like to avoid any ambiguity or confusion about deadlines and what claims remain in the case. To that end, we propose the following:

1. By Friday, March 15, Daily Mail will file a conforming amended complaint, which clarifies the narrowed scope of its claims based on Judge Castel's rulings dismissing certain claims.
2. 15 days following the conforming amendment, Google may file letter briefs seeking to dismiss Daily Mail's state-law claims.
3. Google's deadline to answer a complaint will be 30 days from when the conforming amended complaint is filed or, if Google requests leave to move to dismiss state-law claims, 30 days from resolution of such request or subsequent motion.

Please let us know by Friday, March 8 if Daily Mail is amenable to this proposal. If so, we will draft a proposed stipulation and order outlining the above.

Craig

Craig M. Reiser
Partner



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